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February 3, 2003

**FILED ELECTRONICALLY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., Room TW-A325  
Washington, D.C. 20554

Re: ***Ex Parte***  
*In the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-  
Wideband Transmission Systems, ET Docket No. 98-153, February 14, 2002*

Dear Ms. Dortch:

This *ex parte* reports that on January 31, 2003, Kalpak Gude and Harry Ng of PanAmSat Corporation ("PanAmSat"), Richard DalBello of the Satellite Industry Association, John Stern of Loral Space & Communications, Ltd., Nancy Eskenazi (via telephone) of SES Americom, Inc., and the undersigned counsel, representing PanAmSat, met with Paul Margie, Office of Commissioner Copps. The points covered in the meeting are reflected in the attached materials.

Respectfully submitted,

/s/ Joseph A. Godles  
Joseph A. Godles  
Attorney for PanAmSat Corporation

Attachments  
Cc: Paul Margie

## **Ultra-Wideband Interference With C-band Satellite Earth Stations**

- The C-band is one of the two principal bands used by the FSS industry, and there are many billions of dollars invested in C-band space and ground station infrastructure.
- The UWB limits adopted by the Commission expose every FSS transponder across the entire C-Band downlink band (3.7-4.2 GHz) to harmful interference.
- The FCC erred in the First R&O because it took only average UWB emissions, not peak UWB emissions, into account in evaluating the potential for interference to FSS. An NTIA study that takes peak transmissions into account found that the emissions levels adopted by the FCC would interfere with C-band downlinks.
- Under the emissions limits that the Commission has adopted, UWB devices would have to be well over a mile from FSS earth stations to prevent harmful interference.
- To protect C-band downlinks, the Commission should either: (1) prohibit intentional UWB transmissions in the 3.7-4.2 GHz band, something it already has done below 3.1 GHz to protect GPS, another satellite service; or (2) reduce the peak EIRP level and establish a high minimum pulse repetition frequency level.
- FSS downlinks are particularly sensitive to interference, because they must receive signals transmitted from satellites that are 22,300 miles away.
- We already have filed an analysis based on interference from outdoor UWB devices.
- We also are preparing a technical analysis demonstrating that indoor UWB devices will cause harmful interference to C-band downlinks.